

REMARKS

Claims 60, 64-66, and 350 have been amended, and claim 67 has been cancelled without prejudice. (It should be noted that the amendments to the claims were made to clarify the claims; the amendments were not made for patentability reasons.) Claims 60-66, 68, and 347-361 are now pending in the application. Applicants respectfully request reexamination and reconsideration of the application in light of the amendments and the following remarks.

Turning first to the Information Disclosure Statement (IDS) received by the PTO on June 5, 2002, Applicants assert that the IDS fully complies with all requirements. As stated in the first paragraph of that IDS, Applicants did not provide copies of the listed references because each of the listed references was cited in the instant application's parent application: U.S. patent application no. 08/452,255. As stated in 37 CFR § 1.98(d), copies of references cited in a parent application need not be provided with an IDS filed in a child application. Thus, the IDS received by the PTO on June 5, 2002 fully complies with all of the requirements of an IDS. Applicants therefore request that each of the references cited in the June 5, 2002 IDS be considered and the accompanying form 1449 be initialed and returned.

Claim 347 was rejected under 35 USC § 112, first paragraph. Applicants respectfully traverse this rejection. By way of example and not limitation, outer portions of the first conductive traces can be exposed and first contact structures mounted to the first conductive traces simply by disposing the second insulating layer to cover some but not all of the first conductive traces. The portions of the first conductive traces not covered by the second insulating layer are exposed, and first contact structures can be mounted to those exposed portions of the first conductive traces.

The specification and drawings provide several examples. One such example is shown in Figure 23A. Again by way of example and not limitation, element 2312 illustrates a first insulating layer, and element 2316 illustrates a first conductive layer. Element 2314 illustrates a second insulating layer, and element 2318 illustrates a second conductive layer. Elements 2302 and 2304 illustrate examples of first electrical contact structures, and elements 2306 and 2308 illustrate examples of second electrical contact structures. Therefore, the specification and drawings do support claim 347.

Applicants note that, although they elected the "contact configuration species" shown in Figure 2A and the "mounting configuration species" shown in Figures 1A-1E in response to the

Restriction requirement dated May 21, 2002, Applicants are nevertheless entitled to rely on the entire specification to meet the requirements of 35 USC § 112, first paragraph. First, there exists no authority in the patent statutes or rules or in case law for excluding any portion of the specification in determining whether a claim meets the disclosure requirements of 35 USC § 112, first paragraph. Second, the Restriction requirement did not purport to limit prosecution to the exact embodiments shown in the selected figures; rather, the Restriction requirement and subsequent Election only purported to limit prosecution to claims covering a "contact configuration" as shown in Figure 2A and a "mounting configuration" as shown in Figure 1A-1E. As stated in the Election, none of the pending claims are limited to any particular "contact configuration" or "mounting configuration," and therefore, all of the claims cover all of the species listed in the Restriction requirement.

Claims 64-67 and 350 were rejected under 35 USC § 112, second paragraph. Applicants have amended these claims to address the Examiner's concern. Applicants assert that the Examiner's concerns have been addressed the rejection rendered moot. Applicants therefore request withdrawal of the rejection.

Claims 60-68 were rejected under 35 USC § 102(b) as anticipated by US Patent No. 5,518,964 to DiStefano et al. ("DiStefano"). Applicants respectfully traverse this rejection.

Initially, Applicants note that DiStefano is not prior art to the instant application under 35 USC § 102(b). The instant application is entitled under 35 USC § 120 to an effective filing date of May 26, 1995, which predates the issue date of DiStefano.

Moreover, DiStefano does not anticipate independent claim 60. Claim 60 recites "a plurality of semiconductor dies." DiStefano plainly identifies element 198 in Figure 20 as a platen. (DiStefano col. 17, line 7.) A platen is not a semiconductor die. In addition, nothing in DiStefano suggests replacing the platen 198 with a semiconductor die, nor would there be any reason to do so. Therefore, DiStefano fails to anticipate or render obvious independent claim 60 (and its dependent claims).

Claims 351-361 were rejected under 35 USC § 102(b) as anticipated by US Patent No. 5,821,763 to Beaman et al. ("Beaman"). Applicants respectfully traverse this rejection.

Applicants again note that Beaman is not prior art to the instant application under 35 USC § 102(b). As discussed above, the instant application's effective filing date is May 26, 1995, which predates the issue date of Beaman.

In addition, Beaman does not anticipate independent claim 351 or independent claim 358. Both claims 351 and 358 recite "a semiconductor die." Beaman describes element 60 of Figure 16 not as a semiconductor die but as "a substrate 60 of space transformer 54" (Beaman col. 5, line 30), which is further described as "a multilever [sic: multilevel] metal/ceramic substrate, a multilevel metal/polymer substrate or a printed circuit board" (Beaman col. 3, lines 60-64). Nothing in Beaman teaches or suggests that the "substrate 60 of space transformer 54" be replaced with a semiconductor die, nor would there be any reason to make such a replacement. Therefore, Beaman fails to anticipate or render obvious independent claims 351 and 358 (and their dependent claims).

Applicants acknowledge with appreciation the Examiner's indication that claims 347-350 contain allowable subject matter. Applicants assume that the references on pages 8-10 of the Office Action to a Di Stefano reference and a Lee reference are in error.

Although Applicants believe that no extension of time is needed and no fees are due, Applicants petition the Director for any extension of time deemed necessary for acceptance of this paper, and Applicants authorize the Director to charge any fee deemed necessary for acceptance of this paper to Deposit Account No. 50-0285 (order no. P3D5-US).

Respectfully submitted,

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